

Cole Davis  
Keystone RV Company  
17400 Hackberry Drive  
Goshen, IN 46526

Re: 039-12249  
Second Administrative Amendment to  
FESOP 039-6177-00363

Dear Cole Davis:

Keystone RV Company was issued a permit on December 11, 1996 for operation of recreational vehicle manufacturing facility. A letter requesting change of name of the company was received on May 9, 2000. Pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows:

New responsible official, name of the source, and mailing address are as follows:

Cole Davis  
Keystone RV Company  
17400 Hackberry Drive  
Goshen, IN 46526

Section A.1 of the FESOP is amended as follows:

A.1 General Information

The Permittee owns and operates a recreational vehicle manufacturing facility.

Responsible Official: ~~Brian Brady~~ **Cole Davis**  
Source Address: 28163 CR 20, Elkhart, Indiana 46516  
Mailing Address: ~~P.O.Box 1107, Elkhart, Indiana 46515-1107~~ **17400 Hackberry Drive Goshen, IN 46526**

FESOP Certification form, FESOP Deviation occurrence reporting forms, FESOP Quarterly Report forms, and FESOP Monthly report form are amended as follows:

Source Name: ~~Damon Corporation, Plants 4, 6, 7~~ **Keystone RV Company**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

GS

cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Air Compliance Section Inspector Greg Wingstorm  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR MANAGEMENT**

**Keystone RV Company  
28163 CR 20  
Elkhart, Indiana 46516**

Keystone RV Company, is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F 039-6177-00363	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 11, 1996

First Administrative Amendment 039-8485

Issuance Date: May 23, 1997

Second Administrative Amendment 039-12249	Pages Affected: 4, 24-29
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

## SECTION A SOURCE SUMMARY

### A.1 General Information

The Permittee owns and operates a recreational vehicle manufacturing facility.

Responsible Official: Cole Davis  
Source Address: 28163 CR 20, Elkhart, Indiana 46516  
Mailing Address: 17400 Hackberry Drive Goshen, IN 46526  
SIC Code: 3792  
County Location: Elkhart  
County Status: Maintenance for ozone  
Attainment for all other criteria pollutants  
Source Status: Synthetic Minor Source, FESOP Program

### A.2 Emission Units and Pollution Control Summary

The stationary source consists of the following emission units and pollution control devices:

- a) Surface coating operations involving painting and application of adhesives during assembly (EU1) and touch-up (EU2) of recreational vehicles, capacity 2.5 chassis per hour.
- b) Various woodworking processes involving the manufacture and assembly of recreational vehicles (EU3). These processes are equipped with one (1) baghouse dust collector, known as P1, with a flow rate of 3,186 cubic feet per minute, six (6) baghouse dust collectors, known as P2, P3, P4 P5, P6 and P7, with flow rates of 1,199 cubic feet per minute, and three (3) baghouse dust collectors, known as P8, P9, and P10, with flow rates of 3,000 cubic feet per minute, total capacity: 1,800 pounds of wood per hour.

### A.3 Insignificant Activities

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- c) Paved and unpaved roads and parking lots with public access.
- d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

### A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT  
(FESOP)  
CERTIFICATION**

Source Name: Keystone RV Company  
Source Address: 28163 CR 20, Elkhart, Indiana 46516  
FESOP No.: F 039-6177-00363

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- 9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Relocation Notification
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR MANAGEMENT  
 COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 DEVIATION OCCURRENCE REPORTING FORM  
 (For Control Equipment Monitoring Only)**

Source Name: Keystone RV Company  
 Source Address: 28163 CR 20, Elkhart, Indiana 46516  
 FESOP No.: F 039-6177-00363

A separate copy of this report must be submitted for **each** monitoring device on all control equipment listed in this permit. Attach a signed certification to complete this report.

Stack/Vent ID:	
Control Equipment: (ex: thermal oxidizer, scrubber, baghouses)	
Type of Parameter Monitored: (ex: temperature, pressure drop, efficiency)	
<input type="checkbox"/> Continuously	<input type="checkbox"/> Periodically, at a frequency of:
Parameter Operating Restrictions/Range: (ex: 1,400°F, 2-4 pounds per square inch pressure drop)	
Report Covers From: (date: month/day/yr)	To:
<input type="checkbox"/> No Deviations from the Parameter Restriction/Range Occurred During the Monitoring Period. Complete Records Maintained at the Facility Verify Compliance with this Condition.	
<input type="checkbox"/> Summary of Deviations from the Parameter Restriction/Range During the Monitoring Period are Identified Below. Complete Records Maintained at the Facility.	

	For Parameter Recorded Continuously	For Parameter Recorded Periodically
Total Unit Operating Time		
Total Time of Deviations (Identify All Deviations)		
Percent of Time Indicating Deviations ( $\frac{2}{1} \times 100$ )		

Date of Deviation	Start/Stop Time of Deviation (Continuous Monitoring Only)	Actual Value Recorded	Reason for Deviation & Corrective Action Taken

State Form 47741 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
DEVIATION OCCURRENCE REPORTING FORM**

Source Name: Keystone RV Company  
Source Address: 28163 CR 20, Elkhart, Indiana 46516  
FESOP No.: F 039-6177-00363

A separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit.  
Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 pounds per day, 300 hours per year, 5000 gallons per month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
9 Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40 percent VOC in inks, 0.5 percent sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
9 Permit Has No Content Limitations for this Parameter.
Comments:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Keystone RV Company  
Source Address: 28163 CR 20, Elkhart, Indiana 46516  
FESOP No.: F 039-6177-00363

Facility: Surface Coating of Fiberglass Parts During Assembly (EU1) and Touch Up (EU2)

Parameter: Volatile Organic Compounds (VOCs)

Limit: 24.0 tons of VOC per 365 day period applied to the applicators, rolled on a monthly basis, fixed at 2.0 tons per month for the first 365 days of operation, beginning April 30, 1996

Year: \_\_\_\_\_

Month	VOC Usage (tons/month)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Keystone RV Company  
Source Address: 28163 CR 20, Elkhart, Indiana 46516  
FESOP No.: F 039-6177-00363

Facility: Surface Coating During Assembly (EU1) and Touch Up (EU2)

Parameter: VOC and HAPs Delivered to the Applicators

Limit: 0.75 tons per month of any single HAP.  
2.00 tons per month of any combination of HAPs.  
8.25 tons per month of VOC.

Year: \_\_\_\_\_

Month	Total VOC (tons per month)	Combination of HAPs (tons per month)	Worst Case Single HAP (tons per month)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FESOP Monthly Report**

Source Name: Keystone RV Company  
Source Address: 28163 CR 20, Elkhart, Indiana 46516  
FESOP No.: F 039-6177-00363  
Facility: Touch-Up Surface Coating of Wood Parts  
Parameter: Volatile Organic Compounds  
Limit: 10 gallons of coating per day

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day	Usage This Day (gallon/day)	Day	Usage This Day (gallon/day)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		Total	

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_